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May 11, 2022

VIA ECF

Hon. William F. Kuntz, II
United States District Judge
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Tania Galarza v. SmileDirectClub, LLC, HealthCare Finance Direct, LLC,
Periodontal Specialists, Inc., and Eric Guirguis, D.D.S.*
Civil Action No. 1:21-cv-06958 (WFK)(JRC)

Dear Judge Kuntz:

We represent Defendants SmileDirectClub, LLC (“SDC”), HealthCare Finance Direct, LLC (“HFD”), Periodontal Specialists, Inc. (“PSI”), and Eric Guirguis, D.D.S. (“Dr. Guirguis”) (collectively “Defendants”) in the above-referenced lawsuit.

In accordance with Your Honor’s Individual Motion Practices and Rules, and the Order dated April 11, 2022 (Dkt. 12), on May 11, 2022, I caused Defendants’ Notice of Motion to Compel Arbitration and Dismiss the Complaint, Memorandum of Law in Support, Declarations of Justin Skinner and Augustin Razo, and Exhibits 1-2 to be served on the following via U.S. mail and email:

James Lutfy, Esq.
1405 Clove Rod
Staten Island, NY 10301
lutfy@verizon.net
Counsel for Plaintiff

In accordance with same, attached is a copy of the cover letter served on Plaintiff’s Counsel, and Defendants’ will electronically file their motion and reply papers when the motion is fully briefed (on or by June 29, 2022 at 5:00pm).

Sincerely,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP

/s/ Deana S. Stein

Deana S. Stein

cc: James Lutfy, Esq. (via ECF)



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May 11, 2022

Via U.S. Mail and E-mail

James Lufty, Esq.
1405 Clove Rod
Staten Island, NY 10301
lutfy@verizon.net

Re: Tania Galarza v. SmileDirectClub, LLC, HealthCare Finance Direct, LLC,
Periodontal Specialists, Inc., and Eric Guirguis, D.D.S.
Civil Action No. 1:21-cv-06958 (WFK)(JRC)

Dear Counsel:

As you know, we represent Defendants SmileDirectClub, LLC (“SDC”), HealthCare Finance Direct, LLC (“HFD”), Periodontal Specialists, Inc. (“PSI”), and Eric Guirguis, D.D.S. (“Dr. Guirguis”) (collectively “Defendants”) in the above-referenced lawsuit.

In accordance with Judge Kuntz’s Individual Motion Practices and Rules and the Order dated April 11, 2022 (Dkt. 12), enclosed is the following:

- Notice of Defendants’ Motion to Compel Arbitration and Dismiss the Complaint
- Defendants’ Memorandum of Law in Support
- Declaration of Justin Skinner, with Exhibits 1-2
- Declaration of Augustin Razo

This constitutes service of this motion, and in accordance with Dkt. 12, Defendants’ will electronically file their motion and reply papers when the motion is fully briefed (on or by June 29, 2022 at 5:00pm).

Sincerely,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP

A handwritten signature in black ink, appearing to read 'Deana S. Stein', with a long horizontal flourish extending to the right.

Deana S. Stein

Enclosures